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August 25, 1981

Mr. Phillip Lear
VanCott, Bagley, Cornwall & McCarthy
50 South Main Street
Salt Lake City, Utah 84111

RE: Chevron Chemical Company
Fertilizer Plant

Dear Mr. Lear:

This letter will memorialize my conversation of August 21, 1981, with Patrick O'Hara, a law clerk employed with your firm.

On August 20, 1981, Mr. O'Hara did make inquiry at the Division of Oil, Gas and Mining regarding pertinent regulations for noncoal slurry lines.

I tentatively confirmed Mr. Daniels' opinion that there were no specific regulations promulgated for the situation described by Mr. O'Hara. However, I did tell Mr. O'Hara that I wished to investigate the matter further.

Thus, on August 21, 1981, I did contact Mr. O'Hara by telephone. According to my information and research, there are two instances when operators of a noncoal slurry line would be subject to jurisdiction by the Division of Oil, Gas and Mining. These two instances would occur when topsoil was removed from the site to lay the slurry line and when the operator commenced final reclamation of this area. The pertinent rules and regulations and statutory authority for the Division's jurisdiction at the times mentioned above are found in the Division's "green" book entitled "The Oil and Gas Conservation Act, The Mined Land Reclamation Act and The General Rules and Regulations and Rules of Practice and Procedure."

If you have any further questions, please do not hesitate to contact any staff member at the Division for further assistance.

Sincerely,

Carolyn L. Driscoll
CAROLYN L. DRISCOLL
RECLAMATION LEGAL SPECIALIST

CLD/btm